THE HONORABLE JAMES L. ROBART 2 3 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 PATTI WILLIAMS, Case No. 2:18-cy-00959-JLR 10 Plaintiff. DEFENDANT'S UNOPPOSED 11 MOTION FOR EXTENSION OF TIME TO ANSWER 12 THE PRUDENTIAL INSURANCE NOTE ON MOTION CALENDAR: COMPANY OF AMERICA, 13 August 2, 2018 Defendant. 14 15 Defendant The Prudential Insurance Company of America ("Prudential"), by and through 16 its attorneys, respectfully asks this Court to grant an order extending the time for Prudential to 17 answer or otherwise respond to the complaint. The deadline to answer or otherwise respond is 18 currently August 14, 2018. Plaintiff Patti Williams ("Plaintiff") does not oppose this motion. 19 Prudential respectfully requests an extension of time to answer or otherwise respond of 14 days 20 until August 28, 2018. 21 In support of its unopposed motion, Prudential states as follows: 22 1. On June 28, 2018, Plaintiff filed this action in the United States District Court for 23 the Western District of Washington. 24 2. On July 6, 2018, Defendant The Prudential Insurance Company of America 25 ("Prudential") was served through the Washington Insurance Commissioner. (Dkt. 3.) 26 3. On July 26, 2018, Plaintiff filed her first amended complaint. (Dkt. 11.) 27 4. Prudential's response is currently due on August 14, 2018. DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER (Case No. 2:18-CV-00959-JLR) - 1

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- 5. Prudential began promptly collecting and reviewing the relevant file documents in order to prepare a response to Plaintiff's complaint, but requests additional time of 14 days to complete its investigation and prepare its response.
- 6. On July 31, 2018, national counsel for Prudential conferred with counsel for Plaintiff regarding the request for an extension of fourteen (14) days to answer or otherwise respond to Plaintiff's complaint. Plaintiff's counsel indicated that Plaintiff does not oppose this request.
- 7. This motion is filed before the response to the complaint is due and is filed in good faith and not for the purpose of unwarranted delay.

WHEREFORE, Prudential respectfully requests that the Court issue an order granting Prudential an additional fourteen (14) days, until August 28, 2018, to answer or otherwise respond to Plaintiff's complaint.

DATED: August 2, 2018

## LANE POWELL PC

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DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER (Case No. 2:18-CV-00959-JLR) - 2

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Having reviewed the unopposed motion for extension of time to answer or otherwise respond to the complaint, the Court hereby GRANTS the motion and ORDERS that The Prudential Insurance Company of America's deadline to answer or otherwise respond to the complaint is extended until August 28, 2018.

IT IS SO ORDERED.

DATED this 2nd day of August, 2018

Honorable James L. Robart United States District Court Judge

DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER (Case No. 2:18-CV-00959-JLR) - 3

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DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER (Case No. 2:18-CV-00959-JLR) - 4

CERTIFICATE OF SERVICE

I certify that on the date listed below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I certify that the following document was sent to the following CM/ECF participants:

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DATED THIS 2nd day of August, 2018, at Seattle, Washington.

s/ Lou Rosenkranz

Lou Rosenkranz, Legal Assistant

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